

U.S. Department of Energy
Office of River Protection
Mr. Michael K. Barrett
Contracting Officer
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 036702

Dear Mr. Barrett:

**CONTRACT NO. DE-AC27-01RV14136 – TRANSMITTAL FOR APPROVAL –
AUTHORIZATION BASIS CHANGE NOTICE 24590-WTP-ABCN-ESH-02-002,
REVISION 0, *PROPOSED REVISION TO ISMP CHAPTER 11.0, “ORGANIZATION
ROLES, RESPONSIBILITIES, AND AUTHORITIES”***

Bechtel National, Inc. (BNI) is submitting Authorization Basis Change Notice (ABCN), 24590-WTP-ABCN-ESH-02-002, Revision 0, to the U.S. Department of Energy (DOE), Office of River Protection and the Office of Safety Regulation (OSR) for approval (attached). This ABCN proposes to remove redundancies between Chapter 11 of the Integrated Safety Management Plan (ISMP) and similar Quality Assurance Manual safety-related roles, responsibilities, and authorities.

Clarification of the Hanford Tank Waste Treatment and Immobilization Plant (WTP) design, construction, and commissioning (DC&C) Contractor organization roles, responsibilities, and authorities, as described in these proposed revisions to ISMP Chapter 11, serves to support design, construction, and commissioning of the WTP in a safe manner. This proposed change will also continue to meet the DOE expectation that safety definition, implementation, and maintenance roles, responsibilities, and authorities defined in the ISMP are clear and appropriate.

This ABCN is in response to the DOE OSR question number 01-ISMP-017 that was submitted against the ISMP changes proposed in ABCN-24590-01-00008, Revision 0. This ABCN was transmitted to the DOE as the revised Standards Approval Package (SAP) portion of the WTP Project Construction Authorization Request (CAR).

Approval of this ABCN is requested by, October 1, 2002, to support CAR approval of the SAP.

An electronic copy of ABCN 24590-WTP-ABCN-ESH-02-002, Revision 0, is provided for the OSR's information and use.

Please contact Mr. Bill Spezialetti at (509) 371-4654 for any questions or comments.

Very truly yours,

A. R. Veirup
Prime Contract Manager

TR/slr

Attachment: Authorization Basis Change Notice (ABCN), 24590-WTP-ABCN-ESH-02-002,
Revision 0, plus attachments

cc: <u>Name (ALPHABETIZE)</u>	<u>Organization</u>	<u>MSIN</u>
Barr, R. C. w/a (1 hard copy and 1 electronic copy)	OSR	H6-60
Beranek, F. w/o	WTP	MS6-P1
Betts, J. P. w/o	WTP	MS4-A1
Dickey, R. w/a	WTP	MS6-R1
DOE Correspondence Control w/a	ORP	H6-60
Erickson, L. w/a	ORP	H6-60
Gibson, K. w/o	WTP	MS6-R1
Nakao, R.M. w/a	WTP	MS4-B2
Naventi, R. F. w/o	WTP	MS4-A1
Ollero, J. E. w/o	ORP	H6-60
PDC w/a	WTP	MS5-K1
QA Project Files w/a	WTP	MS4-A2
Ryan, T. B. w/a	WTP	MS6-R1
Struthers, D. J. w/o	ORP	H6-60
Swailles, J. H. w/a	ORP	H6-60
Taylor, W. J. w/a	ORP	H6-60
Veirup, A. R. w/o	WTP	MS4-A1



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C. ABCN Approval

WTP Project Manager Ron Naventi
Print/Type Name *Signature* *Date*

II. Description of the Proposed Change to the Authorization Basis

D. Affected AB Documents:

Title	Document Number	Revision
Integrated Safety Management Plan (ISMP)	24590-WTP-ISMP-ESH-01-001	1

Decision to Deviate ☐ Yes ☒ No

If yes, DTD Number N/A Deficiency Report Number N/A

Initiating Document Number DE-AC27-01RV14136 Revision 0
(WTP Project Contract)

E. Describe the proposed changes to the Authorization Basis Documents:

The Integrated Safety Management Plan (ISMP) Chapter 11.0, Organization Roles, Responsibilities, and Authorities, is proposed to be revised. The proposed changes address removal of redundancies between the ISMP, Revision 1, and the QAM, Rev. 0, safety-related roles, responsibilities, and authorities in ISMP Section 11.1 Design Construction, and Commissioning Contractor (DC&C) Organization Roles, Responsibilities, and Authorities for the design, construction, and commissioning (DC&C) phase of the WTP Project and the envisioned roles for the future Waste Treatment Plant (WTP) Operating Contractor in ISMP Section 11.2. These DC&C roles, responsibilities, and authorities defined in the ISMP and the QAM, as assigned to individuals and organizations within the Bechtel National, Inc. (BNI) team as the DC&C Contractor, were compared to determine if there was an overlap in the documentation of these responsibilities. The items in the ISMP redundant to the comparable items in the QAM were proposed for removal from the ISMP. The coverage of some safety-related roles and responsibilities in the QAM is noted in discussion text on this point in Section 11.0 of the ISMP.

To remove another redundant item between the ISMP and the QAM documents, the ISMP Figure 11-1 on "Organization Roles, Responsibilities, and Authorities, is proposed to be removed.

In addition to the removal of ISMP Section 11.1 responsibilities and the ISMP Section 11.0 Figure 11-1 organization chart that is considered redundant with the QAM, there were three other responsibilities items in ISMP Section 11.1 for the Project Manager that are proposed for change.

The first item was revision of a responsibility under the Project Manager as follows:

- Setting AB safety-related performance expectations.

The second item was removal of the following responsibility under the Project Manager:

- ~~Signatory on permit applications for the construction of the Facility~~

The third item was revision of a responsibility under the Operations Manager as follows:

- Writing and maintaining operating procedures, ~~including post deactivation activities.~~



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E. Describe the proposed changes to the Authorization Basis Documents:

To accurately reflect the roles, responsibilities for the Process Technology Manager in Section 11.1, the current, six items for the Process Technology Manager's role were proposed to be replaced with the following two items:

- 1) Supporting independent safety review in the WTP Project process flowsheet areas of responsibility.
- 2) Developing and monitoring the process flowsheet.

In addition to these proposed revision changes, a new Section 11.1 item for the WTP Project Acquisitions Services Manager was added to reflect this new Project position. As the responsibilities for this manager are provided in the QAM, that AB document is referenced ("pointed to") for the definition of these responsibilities.

The top-level WTP Project organization chart in the ISMP and QAM AB documents shows only the direct reports to the office of the Project Manager. As the Procurement and Property Manager position has been restructured in the WTP Project organization chart to report to the Acquisition Services Manager and the Acquisitions Manager safety and quality responsibilities bound those of the Procurement and Property Manager, this Procurement and Property Manager prior description in ISMP Section 11.1 and Section 11.2 is proposed to be deleted.

NOTES:

- 1) Replacement of the listing of the ISMP Section 11.1 Project Manager's responsibility to "Serve as a member of the Executive Committee" with the new responsibility "Acting on recommendations from Corporate safety oversight" [as approved by DOE for the ABCN-24590-01-00008, Revision 1 proposed changes], was inadvertently not reflected in the Revision 1 update to the entire ISMP document. This editorial change is noted in Attachment 1 to this ABCN.
- 2) In Revision 1 of the ISMP, the Table of Contents listing of Figures inadvertently had the Figure 11-1 removed. As this figure is proposed for deletion in this ABCN, that change is proposed to be left standing, providing that the DOE agrees with this deletion from the ISMP and instead the referencing of the identical figure in the QAM.



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F. List associated ABCNs and AB documents, if any:

ABCN-24590-01-00008, Revision 0, provided an initial set of proposed changes to the ISMP Section 11.1. These "Rev. 0" proposed changes to propose removal of a set of QAM-redundant items were provided with the ISMP revised SAP submittal to the DOE in September 2001. This ABCN (i.e., 24590-WTP-ABCN-ESH-02-002) responds to the DOE/OSR question 01-ISMP-017 on this "Rev. 0" submittal to provide further clarification on this set of proposed changes to the ISMP Section 11.1. This ABCN 24590-WTP-ABCN-ESH-02-002 now provides a smaller, revised set of redundant roles, responsibilities, and authority items proposed for removal from ISMP Section 11.1.

G. Explain why the change is needed

Redundancies that exist between the ISMP, Rev. 1, and the QAM, Rev. 0, safety-related roles, responsibilities, and authorities for the design, construction, and commissioning (DC&C) phase of the WTP Project are being proposed to be removed from the ISMP. This removal will ensure that those particular redundant items will now only be provided in one location within the WTP Project Authorization Basis (AB) documentation.

It should be noted that these "redundancies" are typically not found as verbatim duplication between the ISMP and the QAM, but rather represent elimination of functionally redundant roles that are defined in both of these documents. Thus, those items selected for removal from the ISMP Section 11.1 responsibilities were subject to interpretation on which of these items are functionally redundant between the ISMP and QAM entries.

This ABCN provides the interpretation and justification for removal of these redundant items in its safety evaluation provided by Attachment 2.

As Figure 11-1 in the ISMP has been maintained identical to the corresponding Figure 1 in the QAM Policy Q-01.1; deleting this figure in the ISMP and instead referencing figure 1 in the QAM Policy Q-01.1 eliminates the need to update these figures in both these documents when a Project organizational change occurs. This also removes the possibility of inconsistency between the ISMP and QAM, relative to this organization chart figure.

The addition of the phrase AB safety-related to the Project Manager's responsibility to provide performance expectations, was proposed to clarify that this responsibility specifically applies for radiological, nuclear, and process safety authorization basis performance expectations.

The removal of the responsibility for the Project Manager to sign [environmental] permit applications for the construction of the facility was considered appropriate, as this responsibility does not apply to the ISMP radiological, nuclear, and process AB scope.

The removal of the responsibility for writing and maintaining operating procedures to support post-deactivation activities was considered necessary as this responsibility does not apply to the DC&C phase of the Project.

Removal of the Procurement and Property Manager roles, responsibilities, and authorities and referencing the QAM description of the bounding set of the Acquisition Services Manager's responsibilities places the ISMP Sections 11.1 and 11.2 description at a WTP Project Organization Chart top-level.



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H. List the implementation activities and the projected completion dates:

<u>Activity</u>	<u>Date</u>
Inform DOE that AB has been revised and provide updated hard copy and electronic version of AB changes to DOE	30 days or less after DOE approval
Distribute controlled copy revised pages	30 days after DOE approval

Revise the following implementing documents:

<u>Documents</u>	<u>Describe extent of revisions</u>	<u>Date</u>
1 None		
<u>Describe other activities:</u>		<u>Date</u>
1 None		

III. Evaluation of the Proposed Change

I. Is DOE prior approval required?

- 1 Does the revision involve the deletion or modification of a standard previously identified or established in the SRD? Yes ☐ No ☒

Explain

This ABCN does not specify proposed changes to the SRD, as related to WTP Project DC&C Contractor organization roles, responsibilities, and authorities.

- 2 Does the revision result in the reduction in commitment currently described in the AB? Yes ☐ No ☒

Explain

The proposed ISMP page changes do not reduce the prior commitments made relative to WTP Project DC&C Contractor organization roles, responsibilities, and authorities. Overall, commitments for the scope, application, and compliance with the Contractual and Regulatory Requirements for WTP Project DC&C Contractor organization roles, responsibilities, and authorities continue to be met. See Attachment 2 to this ABCN for the safety evaluations that support the conclusion there is no reduction in commitment.

- 3 Does the revision result in a reduction in the effectiveness of any procedure, program, plan, or management process described in the AB? Yes ☐ No ☒

Explain

The proposed ISMP page changes do not reduce the effectiveness of procedures, programs, plans or management process relative to DC&C Contractor organization roles, responsibilities, and authorities for WTP Project. Overall, commitments for the application and compliance with the Contractual and Regulatory Requirements for WTP Project DC&C Contractor organization roles, responsibilities, and authorities continue to be met. See Attachment 2 to this ABCN for the safety evaluations that support the conclusion there is no reduction in effectiveness.



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J. Complete the safety evaluation by describing how the revision to the AB:

- 1 will continue to comply with all applicable laws and regulations, conform to top-level safety standards, and provide adequate safety

The proposed change to the ISMP Section 11.1 does not affect or conflict with the SRD safety criteria or change the ISMP approach to address WTP Project DC&C Contractor organization roles, responsibilities, and authorities in the design, commissioning, and operation of the WTP. The Project approach continues to comply with the same DOE top-level safety standard for identification of Project Management and Organization safety-related roles, responsibilities and authorities, i.e., the RL/REG-97-07 Item 6.10.a. "Safety definition, implementation, and maintenance roles, responsibilities, and authorities defined in the ISMP are clear and appropriate."

- 2 will continue to conform to the original submittal requirements associated with the AB documents being revised

The proposed ISMP changes continue to conform with the original ISMP submittal requirements in DOE/RL-96-0003 and the DOE position in RL/REG-97-07, Section 6.10, for WTP Project DC&C Contractor organization roles, responsibilities, and authorities, i.e., "Safety definition, implementation, and maintenance roles, responsibilities, and authorities defined in the ISMP are clear and appropriate." These original submittal requirements continued to be conformed with in references made to the QA Manual.

- 3 will not result in inconsistencies with other commitments and descriptions contained in the AB or an authorization agreement

The proposed updates to the ISMP were reviewed against the set of existing RPP-WTP AB documents, as well as the programs, plans, and procedures that implement the AB, and were found to present no inconsistency with other commitments and descriptions contained in the overall AB and authorization agreement. This included a consistency check against the Limited Construction Authorization Request (LCAR) AA that is the only AA currently in place for the project.

K. Justification of the Proposed Change

Provide a justification that demonstrates that the proposed change is safe

The proposed update to the ISMP does not have a negative impact on the WTP safety basis and the revised ISMP Section 11.1 provides an acceptable definition of WTP Project DC&C Contractor organization roles, responsibilities, and authorities. Application of the WTP Project DC&C Contractor organization roles, responsibilities, and authorities as described in this ISMP Section 11.1, will support design, construction, and commissioning of the WTP in a safe manner. This proposed change will continue to meet the DOE expectation that "safety definition, implementation, and maintenance roles, responsibilities, and authorities defined in the ISMP are clear and appropriate."

L. Certification of Continued SRD Adequacy

Based on evaluations from III.I.1 and III.J.1. If question III.I.1 is marked "yes, Project Manager certification is required. The Project Manager's signature certifies that the revised SRD continues to identify a set of standards that provide adequate safety, complies with WTP applicable laws and regulations, and conforms with top-level safety standards and principles. This certification is based on adherence to the DOE/RL-96-0004 standards identification process and successful completion of review and confirmation by the PSC.

WTP Project Manager: N/A
Print/Type Name Signature Date



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M. List of Attachments

- ATTACHMENT 1 Proposed Page Changes to Section 11.0 "Organization Roles, Responsibilities, and Authorities", Section 11.1, "Design, Construction, and Commissioning Contractor Organization Roles, Responsibilities, and Authorities" and Section 11.2, "Operations Contractor Organization Roles, Responsibilities, and Authorities" of 24590-WTP-ISMP-ESH-01-001, River Protection Project Waste Treatment Plant Integrated Safety Management Plan, Revision 1.
- ATTACHMENT 2 Summary of Proposed Changes/Safety Evaluation for ISMP, Revision 1 Section 11.0 "Organization Roles, Responsibilities, and Authorities", Section 11.1, "DC&C Contractor Roles, Responsibilities, and Authorities" and Section 11.2, "Operations Contractor Organization Roles, Responsibilities, and Authorities".

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Attachment 1

Proposed Page Changes to

Section 11.0

“Organization Roles, Responsibilities, and Authorities”,

Section 11.1

**“Design, Construction, and Commissioning Contractor Organization Roles,
Responsibilities, and Authorities”,**

and

Section 11.2

**“Operations Contractor Organization Roles, Responsibilities, and
Authorities”**

**of 24590-WTP-ISMP-ESH-01-001, *River Protection Project Waste Treatment
Plant Integrated Safety Management Plan*, Revision 1**

Document Part	Title	No. of Pages
11.0	Organization Roles, Responsibilities, and Authorities	12

of pages (including cover sheet): 13

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 1 of 12</p>

11.0 Organization Roles, Responsibilities, and Authorities

11.0 Organization Roles, Responsibilities, and Authorities

The responsibility for the design, construction, commissioning, operation, and deactivation of the River Protection Project-Waste Treatment Plant lies with the designated WTP contractors throughout these various life-cycle phases of the Facility. These contractors to the Department of Energy, Office of River Protection will include the Design, Construction, and Commissioning (DC&C) contractor, the Operations contractor, and the Deactivation contractor.

As addressed in this ISMP, these contractor's roles, responsibilities, and authorities include defining and implementing nuclear, radiological, and process safety standards and the related safety bases for protection of the WTP occupational workers and the public. These WTP contractors have the sole responsibility for defining and implementing DOE-approved safety standards and communicating those safety standards as requirements to all WTP Project team members and subcontractors who conduct work on the Project.

While the Project team members manage subcontractors, the WTP contractors retain responsibility for oversight of team members and subcontractors performance and for overall project safety. The commitment inherent in this structure is that line management retains the responsibility for development and implementation of the safety basis. Although some specific roles may be reassigned within the organization, line management's responsibility for safety is invariant.

The WTP contractors assign safety roles to functional areas as indicated in Tables 9-1 through 9-5. Table 9-1 specifically defines ~~assigns~~ roles for key elements of the design phase functional groups. Chapter 11 summarizes these roles for the WTP Contractor. The organization chart for the top-level (i.e., direct reports to the WTP Project Manager) DC&C contractor organization is provided in the ~~Figure 1~~ Policy Q-01.1 ~~+~~ Figure 1 of the Quality Assurance (QAM).

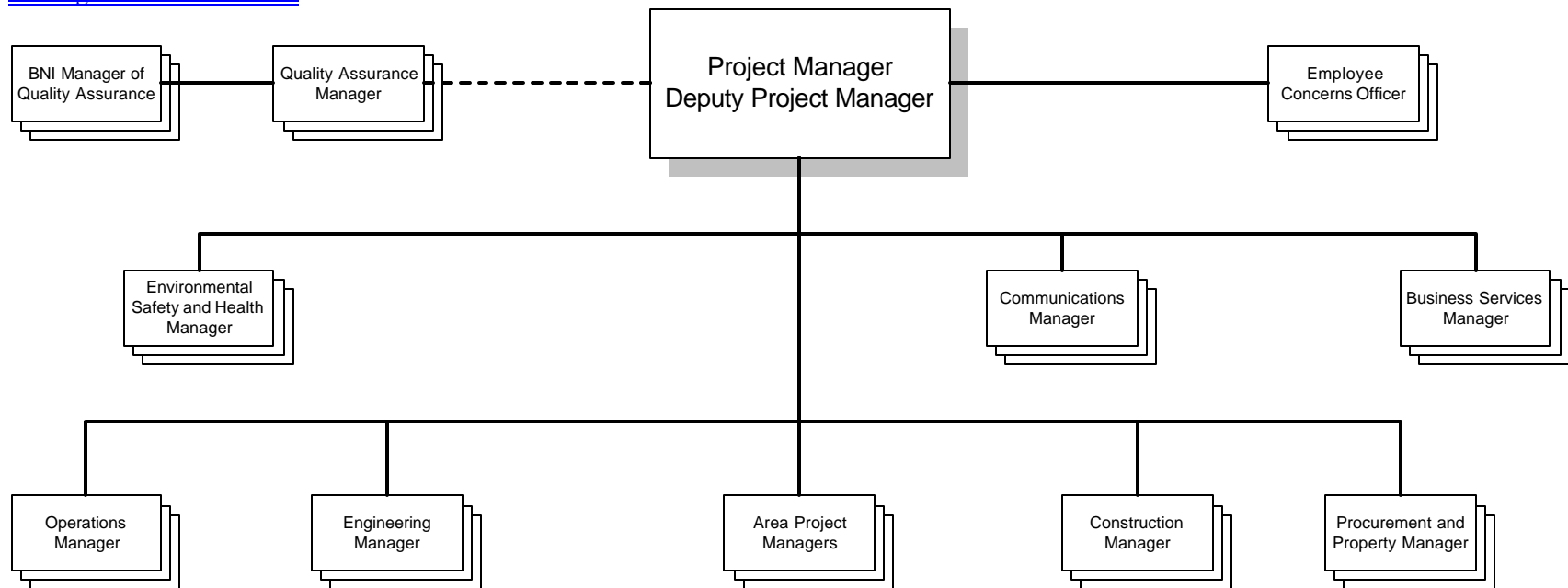
In order to preclude redundant coverage of common, WTP-wide organizational responsibilities between the ISMP and the QAM documents, these common -roles, responsibilities, and authorities that are assigned to individuals and organizations within the DC&C Contractor organization, are presented only in the QAM. Those ISMP entries on individual- responsibilities that are uniquely presented in the ISMP, are retained.

The Operations contractor and the Deactivation contractors organization charts will be defined as the Project nears these phases of the Project. Project roles, responsibilities, and authorities for the DC&C contractor are presented in Section 11.1. Envisioned roles, responsibilities, and authorities for the Operations contractor are presented in Section 11.2.

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~~Figure 11-1 Management Structure and Organization for the BNI Design, Construction, and Commissioning Contract~~
~~This figure has been deleted~~



11.0 Organization Roles, Responsibilities, and Authorities

11.1 Design, Construction, and Commissioning Contractor Organization Roles, Responsibilities, and Authorities

Safety-related roles, responsibilities, and authorities for the DC&C phase of the operation, as assigned to individuals and organizations within BNI (the DC&C Contractor), are discussed below.

Project Manager

The Project Manager safety-related roles, responsibilities, and authorities include:

- 1) Responsibility for WTP safety
- 2) Defining safety policy, objectives, and interfaces
- 3) Assigning roles and responsibilities for safety-related activities
- 4) Setting performance expectations
- 5) Developing management assessment policies
- ~~6) Signatory on permit applications for construction of the Facility~~
- ~~7) Serving as a member of the Executive Committee~~
- ~~8) Ensuring implementation of the Quality Assurance Program (QAP)~~
- 6) Acting on recommendations from Corporate safety oversight

Deputy Project Manager

The roles, responsibilities, and authorities of the Deputy Project Manager are provided in the WTP Project Quality Assurance Manual. There are no additional Deputy Project Manager safety-related roles, responsibilities, and authorities to those provided in the Quality Assurance Manual.

~~The Deputy Project Manager safety-related roles, responsibilities, and authorities include:~~

- ~~1) Ensuring that the WTP is designed, constructed, tested, commissioned, operated, and maintained in a safe, reliable, and efficient manner in accordance with policies and all applicable laws, regulations, authorization bases, and technical requirements~~
- ~~2) Integrating nuclear and industrial safety, quality, and environmental protection into all work~~
- ~~3) Managing the design transition, facility and process design, construction, acceptance testing, commissioning, procurement, and operations~~
- ~~4) Integrating the Area Project Managers and functional managers~~
- ~~5) Creating an atmosphere in the workplace where reporting and resolution of conditions adverse to quality is encouraged at all levels~~
- ~~6) Stopping activities within his area of responsibility, which are not accomplished in compliance with applicable authorization bases and/or regulatory requirements~~

Area Project Managers

The safety-related roles, responsibilities, and authorities of the Area Project Managers, in their respective areas of responsibility, include:

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- ~~1) Managing design and construction effort, in their respective area of responsibility.~~
- ~~2) 1) Implementing management assessment policies, in their respective area of responsibility.~~
- ~~3) Implementing the contractor requirements of 10 CFR 820, "Procedural Rules for DOE Nuclear Activities", in their respective area of responsibility.~~
- ~~4) 2) Ensuring the development and implementation of the incident reporting program, in their respective area of responsibility.~~
- ~~5) 3) Ensuring approval by the Engineering Manager of final designs of Safety Design Class and Safety Design Significant features, in their respective area of responsibility.~~
- ~~6) 4) Serving as principal interface with DOE on technical issues, in their respective area of responsibility.~~
- ~~7) 5) Developing and managing the readiness review program to support commissioning, in their respective area of responsibility.~~

Engineering Manager

The Engineer Manager oversees the engineering design activities that are assigned to the DC&C contractor. The safety-related roles, responsibilities, and authorities of the Engineering Manager include:

- 1) Approving final designs of Safety Design Class and Safety Design Significant features
- 2) Updating the treatment process, civil, architectural, structural, electrical, and mechanical design criteria
- 3) Completing the civil, structural, support system, and facility designs including the incorporation of regulatory and quality commitments
- 4) Preparing specifications for procurement of pre-purchased equipment
- ~~5) Incorporating regulatory and quality commitments into the design, procurement, fabrication, inspection, and testing of systems and components~~
- ~~6) 5) Designing measures to facilitate performance of Technical Safety Requirement (TSR) surveillances~~
- ~~7) 6) Designing features to implement the design requirements of 10 CFR 835 Occupational Radiation Protection including features for ensuring personnel exposure during operation is as low as reasonably achievable (ALARA)~~
- ~~8) 7) Selecting materials for fabrication and construction; defining methods for corrosion control; and specifying welding procedures, requirements for nondestructive examination, and codes and standards~~
- ~~9) 8) Designing fire prevention, detection, and suppression features in compliance with state and federal requirements~~
- ~~10) 9) Incorporating deactivation and decommissioning features into the facility design~~
- ~~11) 10) Evaluating proposed changes to civil, structural, support system, and facility designs~~
- ~~12) 11) Updating the process design specifications, process descriptions, basis of design documents~~
- ~~13) 12) Completing the process design including the incorporation of regulatory and quality commitments~~
- ~~14) 13) Developing and implementing the configuration management (CM) program to control the safety and design bases~~
- ~~15) 14) Obtaining documentation defining the physical configuration of the facility and forwarding this documentation to the Project Administration and Controls Organization~~
- ~~16) 15) Developing and implementing of the Configuration Management (CM) program database~~

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 5 of 12</p>

11.0 Organization Roles, Responsibilities, and Authorities

Construction Manager

The safety-related roles, responsibilities, and authorities of the Construction Manager include:

- 1) Implementing procedures and training to enhance construction safety
- 2) Providing input to the configuration management program including as-built information
- 3) Supporting the incident reporting system for construction-related incidents
- 4) Developing procedures for the handling of hazardous material during construction, including packaging, labeling, storage, and shipping practices
- 5) The packaging and manifesting of dangerous waste arising from construction activities
- 6) Interfacing with subcontractors on process safety management and ES&H matters
- ~~7) Incorporating regulatory and quality commitments of SSCs into the construction~~
- ~~8) Implementing the construction testing program to verify that SSCs meet acceptance testing requirements~~

Environment, Safety & Health (ES&H) Manager

The safety-related roles, responsibilities, and authorities of the ES&H Manager include:

- 1) Implementing internal safety and oversight functions
- 2) Developing safety basis and safety-related performance measures
- 3) Implementing the process safety management program
- 4) Developing and implementing the regulatory commitment tracking system, and the incident reporting program
- 5) Interfacing with regulators, stakeholders, and Hanford Site contractors on ES&H matters
- 6) Evaluating proposed changes that involve implementation of nuclear, radiological, and process safety and environmental matters
- 7) Implementing the fire protection program
- 8) Coordinating cooperative agreements with outside agencies such as fire, police, ambulance, and medical services
- 9) Developing and managing the ES&H portions of the readiness review program to support commissioning
- 10) Serving as a member of the Project Safety Committee, supporting independent safety review in the ES&H area of responsibility and serving as the PSC alternate chairperson.
- 11) Updating the process hazards analysis

The ES&H Manager also oversees activities related to radiological, nuclear, and process safety and environment protection. These activities include the following:

- 1) Identifying and evaluating new laws and regulations that may affect the Project safety programs
- 2) Preparing the Limited Construction Authorization (LCA) request
- 3) Interfacing with the regulators during onsite inspections

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 6 of 12</p>

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- 4) Updating the Hazard Analysis Report (HAR), Safety Requirements Document (SRD), and Integrated Safety Management Plan (ISMP)
- 5) Preparing the Preliminary Safety Analysis Report (PSAR) and Final Safety Analysis Report (FSAR)
- 6) Environmental reporting
- 7) Identifying requirements for worker and public safety, security, and environmental regulatory compliance
- 8) Preparing the environmental characterization and monitoring plans
- 9) Preparing permit applications and plans as required for state and federal environmental regulations
- 10) Monitoring environmental compliance during construction
- 11) Developing and implementing the Environmental Radiation Protection Program

Quality Assurance Manager

The roles, responsibilities, and authorities of the Quality Assurance Manager are provided in the WTP Project Quality Assurance Manual. There are no additional Quality Assurance Manager safety-related roles, responsibilities, and authorities to those provided in the Quality Assurance Manual.

~~The safety-related roles, responsibilities, and authorities of the QA Manager are the following:~~

- ~~1) Developing the Quality Assurance Program (QAP)~~
- ~~2) Assessing and auditing project activities to verify compliance with the QAP and other requirements and to determine the effectiveness of the QAP~~
- ~~3) Providing support for the development of qualification and training programs to ensure that required capabilities are achieved and maintained by project personnel~~
- ~~4) Reviewing project documents (e.g., design documents, nuclear and process safety deliverables, work plans, and source evaluation plans) to verify inclusion of appropriate QAP requirements~~
- ~~5) Recommending and exercising work stoppage or controls over further processing in response to quality concerns~~
- ~~6) Assessing and auditing vendor and subcontractor activities to verify compliance with the QAP and other requirements and to determine the effectiveness of the QAP~~
- ~~7) Serving as a member of the Project Safety Committee, supporting independent safety review in the QA area of responsibility~~

The QA Manager has the authority and responsibility to stop project work when the work, if allowed to continue, would result in activities or documents being in noncompliance with stated QA Program^P requirements. The QA Manager is responsible for determining when appropriate corrective or preventative actions have been taken and for lifting the stop work order to allow work to proceed.

Operations Manager

The safety-related roles, responsibilities, and authorities of the Operations Manager include:

- ~~1) Developing a program for operations procedure preparation, review, verification, validation, approval, change, deviation, and internal control~~
- 2) Writing and maintaining operating procedures ~~including post-deactivation activities~~

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11.0 Organization Roles, Responsibilities, and Authorities

- ~~3) Performing administrative responsibilities including maintaining a qualified staff and ensuring effective employee performance~~
- ~~4) 2) Performing ~~radioactive~~ commissioning testing to demonstrate compliance with the acceptance criteria and documenting the results to acceptance criteria.~~
- ~~5) 3) Serving as the chairperson for the Project Safety Committee~~
- ~~6) 4) Developing and managing the readiness review program to support commissioning~~

Research and Technology Manager

The safety-related roles, responsibilities, and authorities of the Research and Technology (R&T) Manager include:

- 1) Serving as a member of the Project Safety Committee, supporting independent safety review in the R&T area of responsibility.

Process Technology Manager

The safety-related roles, responsibilities, and authorities of the Process Technology Manager include:

- 1) Supporting independent safety review in the WTP Project process flowsheet areas of responsibility.
- 2) Developing and monitoring the process flowsheet.
- ~~1) Ensuring that technologies are developed and demonstrated~~
- ~~2) Evaluating the completed process design and proposed changes to the design~~
- ~~3) Identifying commissioning tests to be performed and their acceptance criteria~~
- ~~4) Incorporating regulatory and quality commitments into procurement, fabrication, inspection, and testing of process components~~
- ~~5) Performing systematic design reviews to determine readiness to authorize fabrication and construction of structures, systems, and components (SSC)~~
- ~~6) Implementing design considerations for deactivation and decommissioning~~

Commissioning Manager

The commissioning organization manages the commissioning program. The safety-related roles, responsibilities, and authorities of the Commissioning Manager include:

- 1) Developing the objectives and scope for the startup program
- 2) Developing and evaluating proposed changes to the commissioning program
- 3) Verifying and validating operation and maintenance procedures during performance of testing
- 4) Providing information from the startup program to the operations, training, and procedures groups, and maintenance for verification and validation of operating administrative controls

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 8 of 12</p>

11.0 Organization Roles, Responsibilities, and Authorities

Procurement and Property Manager

~~The Procurement and Property Manager safety-related roles, responsibilities, and authorities include:~~

- ~~1) Providing the processes and procedures for procuring items and services important to safety.~~
- ~~2) Providing full support to the Quality Assurance Program described in the *Quality Assurance Manual* (QAM), thereby assuring that all work performed under his cognizance will conform to and support the requirements of the QAM.~~

Business Services Manager

The safety-related roles, responsibilities, and authorities of the Business Services Manager include:

- 1) Implementing an employee feedback program
- 2) Controlling the facility policy manual (containing the Project Manager safety policy) and all procedures
- 3) Developing and maintaining the records management program (See Table 8-1)

Acquisitions Services Manager

The roles, responsibilities, and authorities of the Acquisitions Services Manager are provided in the WTP Project Quality Assurance Manual. There are no additional safety-related roles, responsibilities, and authorities to those provided in the Quality Assurance Manual.

11.2 Operations Contractor Organization Roles, Responsibilities, and Authorities

The envisioned safety-related roles, responsibilities, and authorities for the Operations phase of the operation, as assigned to individuals and organizations within the Operations Contract, are discussed below.

Facility Manager

Responsibilities and roles of the Facility Manager include the following:

- 1) Ensuring the development and implementation of facility controls to protect the health and safety of the public, and workers and to protect the environment from hazardous situations associated with the chemical and radiological hazards of the facility
- 2) Ensuring that operational activities are properly staffed and controlled
- 3) Managing operation of the facility to obtain the defined work activity while maintaining the authorization basis for the facility
- 4) Approving Facility activities, including modifications to Safety Design Class and Safety Design Significant SSCs
- 5) Ensuring that work is performed in conformance with procedures, policies, and safety requirements
- 6) Implementing the contractor requirements of 10 CFR 820, “Procedural Rules for DOE Nuclear Activities”
- 7) Serving as the Emergency Director during events categorized as emergencies

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 9 of 12</p>

11.0 Organization Roles, Responsibilities, and Authorities

- 8) Assigning roles and responsibilities for activities related to safety including operations, performance improvements, safety improvements, and deactivation of the facility

Operations Manager

Roles of the Operations Manager include the following:

- 1) Developing a program for procedure preparation, review, verification, validation, approval, change, deviation, and internal control
- 2) Writing and maintaining operating procedures including post-deactivation activities
- 3) Performing administrative responsibilities including maintaining a qualified staff and ensuring effective employee performance
- 4) Performing radioactive startup testing to demonstrate compliance with the acceptance criteria and documenting the results to acceptance criteria
- 5) Managing daily facility operation to obtain the define work activity while maintaining compliance to the TSRs
- 6) Performing TSR surveillances assigned to operations and supporting those TSR surveillances assigned to the Maintenance Organization
- 7) Scheduling and managing process system outage activities
- 8) Initiating and managing deactivation
- 9) Obtaining an understanding of the features and limitations of the facility SSCs to facilitate radioactive startup testing, facility operation, and the development of procedures and training
- 10) Developing and implementing the operating staff training program
- 11) Writing and evaluating proposed changes to administrative procedures related to facility operation
- 12) Ensuring operation of support systems (e.g., electrical, instrument air, and steam)
- 13) Performing analysis of feed material, product, and process chemicals
- 14) Developing procedures for hazardous material handling, packaging, labeling, storage, and shipping practices
- 15) The packaging and manifesting of dangerous waste
- 16) Evaluating proposed changes to the radioactive startup program

Environment, Safety, & Health Manager

The ES&H Manager is a member of the PSC and serves as the PSC alternate chairperson. In addition, for the operating project the ES&H organization has the following roles:

- 1) Developing the emergency plan and the emergency plan implementing procedures
- 2) Managing emergency drills and exercises
- 3) Modifying plans and procedures to address internal safety and oversight functions for the deactivation phase
- 4) Developing deactivation safety performance measures, modification of plans and procedures, and confirmation the facility meets the safe storage criteria on completion of deactivation

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 10 of 12</p>
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11.0 Organization Roles, Responsibilities, and Authorities

- 5) Managing occupational health and safety
- 6) Obtaining monitoring, sampling, and record keeping information on facility discharges
- 7) Maintaining state and federal environmental permits
- 8) Maintaining the environmental database
- 9) Keeping environmental regulators informed on current status, concerns, and new data
- 10) Identifying critical aspects of facility deactivation that would affect environmental regulatory compliance
- 11) Developing the USQ identification and evaluation process
- 12) Developing TSR surveillance testing and evaluation program
- 13) Monitoring compliance to the authorization basis
- 14) Updating authorization basis documentation including the FSAR
- 15) Directing incident investigations including reporting, root cause analyses, identification of corrective actions, and tracking of effectiveness of corrective actions and applying lessons learned from relevant facilities
- 16) Developing a process for evaluating deficiencies to nuclear safety requirements subject to 10 CFR 820, “Procedural Rules for DOE Nuclear Activities”
- 17) Preparing a deactivation safety analysis report
- 18) Developing and implementing the Radiation Protection Program for operations that is compliant with 10 CFR 835, “Occupational Radiation Protection”
- 19) Performing radiation and contamination surveys and maintaining personnel exposure records
- 20) Informing management of conditions that could lead to exceeding radiation limits established for radiation areas or exceeding administrative limits for personnel radiological exposure
- 21) Monitoring deactivation activities to ensure personnel exposure meets as low as reasonably achievable (ALARA) objectives

Quality Assurance Manager

The QA Manager is a member of the PSC. Roles of the QA Organization include the following:

- 1) Establishing a Quality Assurance Program for operations
- 2) Performing independent assessments and program compliance audits
- 3) Reviewing the project quality procedures and documenting compliance with applicable QAP requirements
- 4) Modifying and implementing quality assurance plans and procedures for the for deactivation process
- 5) Verifying implementation of corrective action measures and determining that the solutions for quality problems are effective

The QA Manager has the authority and responsibility to stop project work when the work, if allowed to continue, would result in activities or documents being in noncompliance with stated requirements. The QA Manager is responsible for determining when appropriate corrective or preventative actions have been taken and for lifting the stop work order to allow work to proceed.

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 11 of 12</p>
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11.0 Organization Roles, Responsibilities, and Authorities

Engineering Manager

The Engineering Manager a member of the PSC. Roles of the Engineering organization include the following:

- 1) Evaluating startup test results and comparing the results to acceptance criteria
- 2) Developing and evaluating proposed design improvements and changes to engineered features
- 3) Supporting resolution of production problems
- 4) Developing the surveillance and maintenance criteria for facility operations
- 5) Identifying measures that minimize hazards associated with treating and storing radioactive waste, and for the safe handling of fissionable materials
- 6) Performing a job hazard analysis and participating with ES&H to update HAR
- 7) Updating the process hazards analysis (PHA) to support permit and authorization basis updates
- 8) Preparing and implementing a deactivation management plan that includes:
 - updating the HAR
 - defining surveillance and maintenance criteria for deactivation and safe storage
 - developing facility modifications to facilitate performance of surveillance tests
 - implementing measures that minimize hazards associated with treating and storing radioactive materials

Maintenance Manager

The Maintenance Manager oversees the activities of the Maintenance organization. Roles of the Maintenance organization include:

- 1) Defining and implementing a maintenance program that includes preventive, predictive, and corrective maintenance practices and incorporates vendor-recommended maintenance activities and equipment history
- 2) Performing TSR surveillances assigned to maintenance and supporting those TSR surveillances assigned to operations
- 3) Implementing facility modifications
- 4) Developing and modifying operating and maintenance instructions for post-deactivation operational equipment
- 5) Writing maintenance procedures
- 6) Collecting and processing baseline data for system and component performance monitoring and maintenance planning

Procurement and Property Manager

~~The Procurement and Property Manager's safety-related roles, responsibilities, and authorities include:~~

~~1) Providing the processes and procedures for procuring items and services important to safety. Providing full support to the Quality Assurance Program described in the *Quality Assurance Manual (QAM)*, thereby assuring that all work performed under his or her cognizance will conform to and support the requirements of the QAM.~~

<p style="text-align: center;">River Protection Project – Waste Treatment Plant Integrated Safety Management Plan 24590-WTP-ABCN-ESH-02-002, Rev 0, Attachment 1, Page 12 of 12</p>
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11.0 Organization Roles, Responsibilities, and Authorities

Startup Manager

The Startup organization manages the startup testing program. Additional roles of the Startup Manager include the following:

- 1) Evaluating proposed changes to the startup program
- 2) Verifying and validating operation and maintenance procedures during performance of testing
- 3) Providing information from the startup program to the operations, training, and procedures groups, and maintenance for verification and validation of operating administrative controls

Configuration Management Manager

The Configuration Management Manager oversees the activities of the Configuration Management organization. Roles of the Configuration Management organization include the following:

- 1) Continued implementation of the operational configuration management program
- 2) Maintaining the facility operating history to facilitate deactivation of the facility

Administration and Controls Manager

The Administration and Controls Manager continues those activities started by the DC&C contractor Business and Project Controls Organization

Attachment 2

Summary of Proposed Page Changes/Safety Evaluation

Section 11.0

“Organization Roles, Responsibilities, and Authorities”,

Section 11.1

**“Design, Construction, and Commissioning Contractor Organization Roles,
Responsibilities, and Authorities”,**

and

Section 11.2

**“Operations Contractor Organization Roles, Responsibilities, and
Authorities”**

Document Part	Title	No. of Pages
11.0	Summary of Proposed Page Changes/Safety Evaluation	10

of pages (including cover sheet): 11

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
ISMP, Revision 1, Section 11.1,
DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.0/ Organization Roles, Responsibilities, and Authorities/ [11-1]	<p>Add text to discuss that in order to preclude redundant coverage of common, WTP-wide safety or quality related organizational responsibilities between the ISMP and the QAM documents, the common ISMP Chapter 11 safety-related roles, responsibilities, and authorities that are assigned to individuals and organizations within the DC&C Contractor organization, are presented only in the QAM. Those ISMP sections on individual, safety-related responsibilities that are uniquely presented in the ISMP, are retained.</p> <p>Also, add text to this section to denote that the WTP Project design, construction, and commissioning (DC&C) contractor organization chart for the top-level (i.e., direct reports to the WTP Project Manager) DC&C contractor organization is provided in figure 1 of the Quality Assurance (QAM).</p>	<p>Redundancies between the ISMP, Rev. 6c, and the QAM, Rev. 0, safety-related roles, responsibilities, and authorities for the design, construction, and commissioning (DC&C) phase of the Project, as assigned to individuals and organizations within BNI (the DC&C Contractor), were compared. This was done to determine if there was an overlap in the responsibilities in these two documents.</p> <p>The items in the ISMP considered redundant to the QAM were originally proposed for removal from the ISMP in ABCN-24590-01-00008, Revision 0 (the ISMP revised Standards Approval Package). This ABCN provides an update for these proposed changes and identifies the specific QAM section(s) that is/are considered to address these redundant ISMP responsibility items proposed for removal from ISMP Section 11.1.</p>	<p>No</p>	<p>This proposed change is a clarification update. There is no reduction of prior WTP Project commitments or impact on safety basis, definition of WTP Project organization and responsibility is addressed in the QAM.</p> <p>It should be noted that ISMP versus QAM “redundancies” are typically not found as verbatim duplications, but rather represent functionally redundant text. Thus, removal of the ISMP responsibilities which are functionally redundant between the ISMP and QAM entries continues to meet the DOE expectation that safety definition, implementation, and maintenance roles, responsibilities, and authorities are clear and appropriate.</p>

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
ISMP, Revision 1, Section 11.1,
DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.0/ Organization Roles, Responsibilities, and Authorities/ [11-2]	Delete Figure 11-1	As Figure 11-1 in the ISMP has been maintained identical to the corresponding Figure 1 in the QAM Policy Q-01.1, deleting this figure in the ISMP and instead referring to Figure 1 in the QAM Policy Q-01.1 eliminates the need to update and maintain these figures in both documents whenever a top-level Project organizational change occurs. This also removes the possibility of inconsistency between the ISMP and QAM, relative to this organization chart figure.	No	This proposed change is an editorial update. There is no reduction of prior WTP Project commitments or impact on safety basis, as definition of WTP Project organization and responsibility continues to be provided by the top-level organization chart figure that is provided in the QAM (which is also a WTP Project AB document).
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Project Manager [11-3]	Revise this ISMP Section 11.1 responsibilities to delete the following items: 6) Signatory on permit applications for construction of the Facility 8) Ensuring implementation of the Quality Assurance Program (QAP) Add the phrase “AB safety-related to item 4): 4) Setting <u>AB safety-related</u> performance expectations	Addition of the phrase “AB safety-related to item 4) is a clarification of the ISMP AB scope. The removal of item 6) for the PM to sign [environmental] permit applications for the construction of the facility was considered appropriate, as this responsibility does not apply to the ISMP radiological, nuclear, and process AB scope.	No	This proposed change to items 4) and 6) is a clarification update and does not reduce commitment or effectiveness. QAM Policy Q-01.1, Section 3.1 [QAM pages Q01.1-1 and Q01.1-2] was considered to adequately address the item 8) responsibility. There is no reduction of prior WTP Project commitments or impact on safety basis, as this

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
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DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
		The basis for removal of the redundant item 8) in this ISMP section (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.		responsibility is still addressed in the QAM. The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Deputy Project Manager [11-3]	Revise this ISMP Section 11.1 responsibilities to note that the Deputy Project Manager safety-related roles, responsibilities, and authorities are provided in the WTP Project Quality Assurance Manual and delete <u>each</u> of the bulleted items.	The basis/rationale for removal of redundant responsibilities in this ISMP section (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.	No	The verbatim text in QAM Policy Q-01.1, Section 3.2 [QAM page Q01.1-2] was considered to adequately address <u>each</u> of these Project Deputy Manager responsibilities. The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
ISMP, Revision 1, Section 11.1,
DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ Section Title/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Area Project Managers [11-3]	Revise this ISMP Section 11.1 responsibilities to delete the following items: 1) Managing design and construction effort, in their respective area of responsibility. 3) Implementing the contractor requirements of 10 CFR 820, “Procedural Rules for DOE Nuclear Activities”, in their respective area of responsibility.	The basis/rationale for removal of redundant responsibilities in this ISMP section (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.	No	QAM Policy Q-01.1, Section 3.3 [QAM pages Q01.1-2 and Q01.1-3] was considered to adequately address items 1) and 3) of these responsibilities. The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Engineering Manager [11-4]	Revise this ISMP Section 11.1 responsibilities to delete the following item: 5) Incorporating regulatory and quality commitments into the design, procurement, fabrication, inspection, and testing of systems and components	The basis/rationale for removal of redundant responsibilities in this ISMP section (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.	No	QAM Policy Q-01.1, Section 3.5 [QAM page Q01.1-4] and QAM Policy Q-03.1, Section 6.1 [QAM page Q03.1-9] were considered to adequately address item 5) of these responsibilities. The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
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DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ Section Title/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Construction Manager [11-5]	Revise this ISMP Section 11.1 responsibilities to delete the following item: 2) Incorporating regulatory and quality commitments of SSCs into the construction	The basis/rationale for removal of redundant responsibilities in this ISMP section (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.	No	QAM Policy Q-01.1, Section 3.6 [QAM pages Q01.1-4 and Q01.1-5] was considered to adequately address item 2) of these responsibilities. The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Environment, Safety, and Health Manager [11-5 & 11-6]	NO PROPOSED CHANGES IN THIS SUBSECTION	N/A; status provided for completeness.	No	N/A; Status provided for this section to note that no changes are being proposed at this time for this manager's roles, responsibilities, or authorities.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
ISMP, Revision 1, Section 11.1,
DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Quality Assurance Manager [11-6]	Revise this ISMP Section 11.1 responsibilities to note that the Quality Assurance Manager safety-related roles, responsibilities, and authorities are provided in the WTP Project Quality Assurance Manual and delete each of the bulleted items.	Same basis/rationale as proposed revision for responsibilities of the Project Manager.	No	<p>QAM Policy Q-01.1, Section 3.10 [QAM pages Q01.1-7 and Q01.1-8] were considered to adequately address <u>each</u> of these QA Managers responsibilities.</p> <p>The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.</p>

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
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ISMP Rev. 1 Section No./ Section Title/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Operations Manager [11-6]	Revise this ISMP Section 11.1 responsibilities to delete and revise the following items as follows: 1) Developing a program for operations procedure preparation, review, verification, validation, approval, change, deviation, and internal control 2) 1) Writing and maintaining operating procedures including post deactivation activities 3) Performing administrative responsibilities including maintaining a qualified staff and ensuring effective employee performance 4) 2) Performing radioactive commissioning testing to demonstrate compliance with the acceptance criteria and documenting the results to acceptance criteria.	The basis/rationale for removal of redundant responsibilities in this ISMP section (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above. Deleting “including post deactivation activities” from item 2 removes this Deactivation Contractor responsibility from the roles, responsibilities, and authorities of the DC&C Contractor.	No	QAM Policy Q-01.1, Section 3.4 [QAM pages Q01.1-3 and Q01.1-4] was considered to adequately address items 1) and 3) of these responsibilities. The general safety evaluation discussion on removal of redundant responsibilities in the ISMP (versus the QAM) is the same as for the proposed change in ISMP Section 11.0 above.
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Research and Technology Manager [11-7]	NO PROPOSED CHANGES IN THIS SUBSECTION	N/A; status provided for completeness.	N/A	N/A; Status provided for this section to note that no changes are being proposed at this time for this manager’s roles, responsibilities, or authorities.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
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ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Process Technology Manager [11-7]	Replace the current, six items for the Process Technology Manager's role with the following two items: 1) Supporting independent safety review in the WTP Project process flowsheet areas of responsibility. 2) Developing and monitoring the process flowsheet.	Reflects the current safety-related roles, responsibilities of the Process Technology Manager.	N/A	These two roles are consistent with the functions of Process Technology Manager. This revision does not represent a reduction in commitment or effectiveness, as even though not explicitly cited in the ISMP Section 11.1 Engineering Manager responsibilities, the prior six roles for the PT Manager are addressed within the scope of the Engineering Manager's items in Section 11.1.
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Commissioning Manager [11-7]	NO PROPOSED CHANGES IN THIS SUBSECTION	N/A; status provided for completeness.	N/A	N/A; Status provided for this section to note that no changes are being proposed at this time for this manager's roles, responsibilities, or authorities.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
ISMP, Revision 1, Section 11.1,
DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change ¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Procurement and Property Manager [11-8] and 11.2/ Operations Contractor Roles, Responsibilities, and Authorities/ Procurement and Property Manager [11-11]	Delete this text for the roles, responsibilities, and authorities of the Procurement and Properties Manager.	Removal of the Procurement and Property Manager roles, responsibilities, and authorities and referencing the QAM description of the bounding set of the Business Acquisition Manager's responsibilities places the ISMP Sections 11.1 and 11.2 description at a WTP Project Organization Chart top-level.	N/A	N/A; Status provided for this section to note that no changes are being proposed at this time for this manager's roles, responsibilities, or authorities.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.

Integrated Safety Management Plan (ISMP)
Summary of Proposed Changes/Safety Evaluation for
ISMP, Revision 1, Section 11.1,
DC&C Contractor Roles, Responsibilities, and Authorities

ISMP Rev. 1 Section No./ SectionTitle/Subsection (WTP Project Management) Title [Rev. 1 Page No.(s)]	Summary of Proposed Change¹	Basis/Rationale for Proposed Revision	Proposed Change Outside AB (i.e., DOE OSR approval required)?	Basis for AB impact assessment/ Safety Evaluation of Revision
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Business Services Manager [11-8]	NO PROPOSED CHANGES IN THIS SUBSECTION	N/A; status provided for completeness.	N/A	N/A; Status provided for this section to note that no changes are being proposed at this time for this manager's roles, responsibilities, or authorities.
11.1/ DC&C Contractor Roles, Responsibilities, and Authorities/ Business Services Manager [11-8]	Add new text to provide a new Section 11.1 item for the WTP Project Acquisitions Services Manager position that was added to the Project top-level organization. As the responsibilities for this manager are provided in the QAM, that AB document is referenced ("pointed to") for the definition of these responsibilities.	N/A; status provided for completeness.	N/A	N/A; Status provided for this section to note that no changes are being proposed at this time for this manager's roles, responsibilities, or authorities.

NOTES: 1) See Attachment 1 of 24590-WTP-ABCN-ESH-02-002 for the specific wording of the ISMP changes proposed.